

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

---

JERE MEDDAUGH,

Plaintiff,

vs.

Case No. 23-cv-230

WOOD COUNTY DEPUTY JOHN  
MATTHEWS, WOOD COUNTY,

Defendants.

---

**PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO EXCLUDE  
PLAINTIFF'S WITNESSES FROM DONALDSON AND FOLEY**

---

COMES NOW the Plaintiff, Jere Meddaugh, by his attorneys, Davey & Goldman, by Lisa C. Goldman and responds to the Defendants' objections to representative witnesses from Donaldson and Foley. The Court ordered a response by today at 3:00 p.m. Mr. Meddaugh will not be calling a work reference witness at trial.

Dated: September 23, 2024

DAVEY & GOLDMAN

**Electronically Signed By Lisa C. Goldman**

Lisa C. Goldman, SBN 1029893  
Davey & Goldman  
5609 Medical Circle, Suite 101  
Madison, WI 53719  
(608) 630-9700 (telephone)  
(608) 205-5645 (facsimile)  
lgoldman@daveygoldman.com

Attorneys for Plaintiff